

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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MARCUS ANDRE DODD,

Plaintiff,

-against-

MY SISTERS' PLACE, INC.,  
KAREN CHEEKS-LOMAX, individually,  
THOMAS RICE, individually,  
ROBERT R. GHEEWALLA, individually,  
SUZANNE SEIDEN, individually,  
BARBARA RAHO, individually,  
EVAN J. COHEN, individually,  
LINDA PURVIS, individually,  
HILARY TOUHY, individually,  
CHERYL GREENBERG, individually,  
PETER CUTAIA, individually,  
MARIA FAUSTINO, individually,  
DANIA JONES-BROWN individually, and  
CHRISTINA DEBONIS, individually.

Defendants.  
-----X

Case No. 1:21-CV-10987 (VLB)

**AFFIDAVIT OF MARY A. SMITH IN SUPPORT OF INDIVIDUAL DEFENDANTS'**  
**PARTIAL MOTION TO DISMISS PLAINTIFF'S AMENDED COMPLAINT**

Mary A. Smith, an attorney duly admitted to practice law before this Court and the Courts of the State of New York, hereby declares under penalty of perjury that the following statements are true:

1. I am a Principal with Jackson Lewis P.C., attorneys of record for Individual Defendants, Robert R. Gheewalla, Suzanne Seiden, Barbara Raho, Evan J. Cohen, Linda Purvis, Cheryl Greenberg, Peter Cutaia, Maria Faustino, Dania Jones-Brown and Christina Debonis (collectively, "Individual Defendants"), in the above-referenced matter. I submit this Affidavit In Support Of Individual Defendants' Partial Motion To Dismiss Plaintiff's Amended Complaint. I am fully familiar with the facts and circumstances herein.

2. A true and correct copy of the August 5, 2021 Agreement for Investigation and Compliance Consulting Services between My Sister's Place, Inc. and AxilPartners is attached hereto as Exhibit "A."

3. True and correct copies of all unreported decisions cited in Individual Defendants' Partial Motion To Dismiss Plaintiff's Amended Complaint are attached hereto collectively as Exhibit "B."

  
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Mary A. Smith

Dated: May 18, 2022  
White Plains, New York

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Defendants.  
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Case No. 1:21-CV-10987 (VLB)

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing Affidavit Of Mary A. Smith In Support Of Individual Defendant's Partial Motion To Dismiss Plaintiff's Amended Complaint was filed and served via ECF and FedEx, on May 18, 2022 upon Plaintiff Pro Se at the address set forth below:

Marcus Dodd  
4646 North Beacon Street, #102  
Chicago, IL 60640  
marcusandredodd@gmail.com  
*Pro Se Plaintiff*

Maria Grosso  
Maria Grosso